

UNITED STATES DISTRICT COURT United States Courts Southern
for the District of Texas
Southern District of Texas

FILED

October 20, 2022

United States of America
v.
Angelica Maria DEACOSTA
YOB: 1986 COC: United States

Nathan Ochsner, Clerk of Court

Case No. M-22-2052-M

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 20, 2022 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 U.S.C. Section 1324(a)(1)(A)(ii)

Offense Description

knowing or in reckless disregard of the fact that aliens have come to, entered,
or remain in the United States in violation of law, transports, moves, or
attempts to transport or move said aliens within the United States by means
of motor vehicle, in furtherance of such violation of law

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet./s/Lorenzo Botello CBP Enforcement Officer*Complainant's signature*

Approved by: AUSA Lee Fry

Submitted by reliable electronic means, sworn to and attested
telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

Lorenzo Botello CBP Enforcement Officer*Printed name and title*Date: October 20, 2022 **10:33 PM**City and state: McAllen, Texas

*Judge's signature*Nadia S. Medrano U.S. Magistrate Judge*Printed name and title*

Attachment A

On October 20, 2022, Angelica Maria DEACOSTA (hereinafter DEACOSTA), a United States citizen, attempted to enter the United States through the Donna, Texas Port of Entry as the driver of a vehicle containing two passengers - S.W.A.R. (male, age 4) and C.D.M.A. (male, age 1).

At primary inspection, DEACOSTA stated that she and the children had gone to Mexico to get a permit to travel further into Mexico and indicated that the two children belong to her husband's niece, and she was asked to bring them to Torreon, Mexico. DEACOSTA presented her United States Passport and provided a Minnesota birth certificate for each child. The officer then asked DEACOSTA if she had any documentation stating that the children were allowed to travel with her outside the country and DEACOSTA appeared nervous while retrieving a notarized document. DEACOSTA and the children were then referred to secondary inspection.

At secondary inspection, DEACOSTA admitted that the two birth certificates that she presented did not belong to the children that were traveling with her. She indicated that the birth certificates were mailed to her by the children's aunt.

An interview of DEACOSTA was conducted, and she stated that she picked up the children at a Burger King in Rio Bravo, Mexico and she was to take them to Corpus Christi, Texas. She further stated that another individual was going to be there to pick them up and that she expected to be paid for transporting them into the United States.

Database queries on the children, S.W.A.R. and C.D.M.A., revealed that they each lacked legal status to enter the United States.